

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

iRACING.COM MOTORSPORT SIMULATIONS LLC,	)	
a Delaware Limited Liability Company, Plaintiff	)	
	)	
V.	)	Civil Action No.
	)	05-11639 NG
TIM ROBINSON, individually and d/b/a	)	
<a href="http://www.ow-racing.com">www.ow-racing.com</a> and <a href="http://www.torn8oalley.com">www.torn8oalley.com</a> ,	)	
Defendant	)	
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JOINT REPORT ON STATUS OF SETTLEMENT NEGOTIATIONS

1. Plaintiff does not want to close out this case with a stipulation of dismissal or voluntary judgment from defendant. Plaintiff wants to obtain a formal court order of its rights, based upon a fleshed out record.

2. Plaintiff inquired whether Defendant is amenable to stipulating to a set of facts setting forth his actions relating to iRacing software in exchange for placing a financial cap on the damages to be paid by Defendant.

3. Defendant requested (a) a brief summary of the proposed facts, and (b) the amount of the cap.

4. Plaintiff responded that it is requesting Defendant to stipulate to all facts in the Complaint and in Defendant's deposition.

5. Defendant is willing to stipulate only to facts as to which he has knowledge and which he believes to be true. That would cover what is in his deposition, but it would not cover some of what is in Plaintiff's Amended Complaint.

6. Plaintiff now has requested that Defendant identify which specific facts he will not

stipulate to.

7. Although there may now be some minor additions, in general Defendant is not willing to stipulate to much beyond what Defendant has admitted in his Answer to the Amended Complaint.

8. This is not acceptable to Plaintiff.

By their attorneys,

/s/ Michael G. Andrews

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Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent by U.S. Mail to any indicated as non registered participants on this date.

March 17,2006

Joseph F. Ryan BBO# 435720